

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

NORRIS McLAUGHLIN, P.A.

Morris S. Bauer
Melissa A. Pena
Catherine L. Corey
400 Crossing Boulevard, 8th Floor
P.O. Box 5933
Bridgewater, New Jersey 08807
(908) 722-0700
msbauer@norris-law.com
mapena@norris-law.com
clcorey@norris-law.com
Counsel for the Debtors/Debtors-in-Possession

In re:

IMMUNE PHARMACEUTICALS INC, *et al.*,

Debtors.¹

Chapter 11

Case No. 19-13273 (VFP)

Hon. Vincent F. Papalia

**NOTICE OF DEBTORS' MOTION SEEKING TO (A) SELL THE CEPLENE®
PRODUCT LINE, PURSUANT TO 11 U.S.C. §§ 363(B) AND (F), FREE AND CLEAR OF
ALL LIENS, CLAIMS AND INTERESTS; (B) ASSUME AND ASSIGN VARIOUS
EXECUTORY CONTRACTS PURSUANT TO 11 U.S.C. §§ 365(A); AND (C) OTHER
RELATED RELIEF**

PLEASE TAKE NOTICE that, on the date specified by the Court in the *Order Shortening Time for Notice of Hearing Pursuant to Fed. R. Bankr. P. 9006(c)(1) on the Debtors' Motion Seeking to (a) Sell the Ceplene® Product Line Pursuant to 11 U.S.C. §§ 363(b) and (f), Free and Clear of All Liens, Claims and Interests; (b) Assume and Assign Various Executory Contracts Pursuant to 11 U.S.C. §§ 365(a); and (c) Other Related Relief* (the "Motion"), the above-captioned debtors and debtors-in-possession (the "Debtors"), by and through their undersigned counsel,

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Immune Pharmaceuticals, Inc. (1431); Immune Pharmaceuticals, Ltd.; Cytovia, Inc. (7805); Immune Oncology Pharmaceuticals, Inc.; Maxim Pharmaceuticals, Inc. (9983); and Immune Pharmaceuticals USA Corp. (9630).

Norris McLaughlin, P.A., shall move before the Honorable Vincent F. Papalia at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King Jr. Building, 50 Walnut Street, 3rd Floor, Courtroom 3B, Newark, New Jersey 07102 for the entry of an Order entering the relief sought in the Motion.

PLEASE TAKE FURTHER NOTICE that the Debtors will rely upon the Declaration of Gary H. Rabin with exhibits, the Memorandum of Law, and proposed form of Order filed simultaneously herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-2(a), opposition to the relief requested in the Motion, if any, shall be filed and served upon all parties in such other timeframe as the Court designates in the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d) and the requested relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9016-1(f), the Debtors respectfully request oral argument of the Motion if a timely objection is filed.

Dated: March 15, 2019

Respectfully submitted,

NORRIS McLAUGHLIN, P.A.

By: s/ Morris S. Bauer

Morris S. Bauer

Counsel for the Debtors and Debtors-in-Possession